

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MARK MULDOWNEY

2004 SEP 22 A 9:43

V.

CIVIL ACTION NO. 04-11740-GAO  
U.S. DISTRICT COURT  
DISTRICT OF MASS

RICK SMITH

MOTION TO AMEND COMPLAINT

The plaintiff requests that the following changes be made to the complaint.

1. Replace averment 3 with "This Court has jurisdiction over this matter pursuant to 28 U.S.C. 1331, 28 U.S.C. 1343 and 28 U.S.C 1346".
2. Replace averment 4 with "The defendant Rick Smith has over a period of years and in direct violation of the plaintiffs 4th Amendment rights, utilized powerful, modern electronic surveillance equipment to conduct 'unreasonable searches' of the plaintiff, his house, person and effects".
3. Replace averment 8 with "The plaintiff is entitled to relief because the herein alleged actions of the defendant have caused irreparable harm to the plaintiff by violating his 4th Amendment "right of the people to be secure in their persons, houses, papers and effects, against unreasonable searches..."".

Signature

*Mark Muldowney* pro se

Name

Mark Muldowney

Address

245 Porter Street

Melrose, MA 02176

Telephone # (781) 665-0908